

WILLIAM D. PLEASANTS, SR. \*  
11530 B Liberty Road \*  
Frederick, Maryland 21701 \*

and \* IN THE

MARTHA J. PLEASANTS, his wife\*  
11530 B Liberty Road CIRCUIT COURT  
Frederick, Maryland 21701 \*

Plaintiffs \* OF MARYLAND

vs. \* FOR FREDERICK COUNTY

JOHN SAMUEL WILLIAMS \*  
8710 Green Valley Road \*  
Libertytown, Maryland 21762 \* Case No. 2127E

and \*

ALL PERSONS HAVING OR \*  
CLAIMING TO HAVE AN INTEREST \*  
IN THE HEREIN DESCRIBED \*  
PROPERTY \*

Defendants

\* \* \* \*\*\* \* \* \*

COMPLAINT TO QUIET TITLE AND/OR TO ESTABLISH TITLE BY  
ADVERSE POSSESSION

Come now the Plaintiffs, William D. Pleasants, Sr.  
and Martha J. Pleasants, his wife, by their attorneys, Rand  
D. Weinberg and Weinberg & Weinberg, and do hereby sue to  
quiet title and to establish title by adverse possession to  
the property described herein, and as cause therefor state  
as follows:

1. Plaintiffs are presently in actual peaceable  
possession of a certain parcel of property located in  
Frederick County, Maryland, hereinafter referred to as the  
"Property" and more specifically described on Exhibit A,  
which is attached hereto and incorporated herein.